## GOTTLIEB & ASSOCIATES

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June 29, 2022

## **VIA ECF**

The Honorable John G. Koeltl United States Magistrate Judge United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re:

Young v. KSK Private Label Holdings, Inc.,

Case No.: 1:22-cv-2902

Dear Judge Koeltl,

The undersigned represents Leshawn Young, on behalf of herself and all other persons similarly situated ("Plaintiff"), in the above-referenced action against Defendant, KSK Private Label Holdings, Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for July 6, 2022, at 2:30 PM be adjourned for 60 days because Counsel for the Defendant has not yet answered or appeared in this Action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 45 days to respond to the Complaint until August 15, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension

We thank the Court for its time and attention in this matter.

Respectfully submitted,

**GOTTLIEB & ASSOCIATES** 

/s/Michael A. LaBollita, Esq. Michael A. LaBollita, Esq.